

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

Sapphire Crossing LLC,
Plaintiff,

v.

1:18-cv-01717-MN-CJB (LEAD)

Quotient Technology, Inc.
Defendant.

Sapphire Crossing LLC,
Plaintiff,

v.

1:19-cv-01402-MN-CJB

Robinhood Markets, Inc.
Defendant.

DEFENDANT'S MOTION TO DISMISS

Pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, defendant Robinhood Markets, Inc. hereby moves to dismiss the First Amended Complaint filed by Sapphire Crossing, LLC (D.I. 109) for failure to state a plausible claim for relief. The reasons for this Motion are set forth in the accompanying brief in support, which is incorporated herein by reference.

Dated: July 31, 2020

Respectfully submitted,

MORGAN, LEWIS & BOCKIUS LLP

/s/ Amy M. Dudash

Jason C. White (admitted *pro hac vice*)
Scott D. Sherwin (admitted *pro hac vice*)
Brittany A. Washington (*pro hac vice* pending)
77 West Wacker Drive, Sixth Floor
Chicago, IL 60601
Telephone: 312.324.1000
jason.white@morganlewis.com
scott.sherwin@morganlewis.com
brittany.washington@morganlewis.com

Amy M. Dudash (DE Bar No. 5741)
Morgan, Lewis & Bockius LLP
The Nemours Building
1007 North Orange Street, Suite 501
Wilmington, Delaware 19801
Telephone: 302.574.3000
amy.dudash@morganlewis.com

*Attorneys for Defendant
Robinhood Markets, Inc.*